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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
JASON EDWARD STELLA,)
)
Defendant.)

Criminal No. 3:06-cr-535

SUPERSEDING INDICTMENT

T. 18, U.S.C., §2422(b)

T. 18, U.S.C., §875(d)

T. 18, U.S.C., §§2251(a) and (e)

T. 18, U.S.C., §2253

THE GRAND JURY CHARGES:

COUNT 1

(Coercion and Enticement of Minor)

On or about October 1, 2005, and continuing until on or about April 30, 2006, in Scott County in the Southern District of Iowa, and elsewhere, the defendant, JASON EDWARD STELLA, used means of interstate commerce, that is, the Internet and telephone systems, to knowingly persuade, induce, and entice an individual who had not attained the age of 18 years to engage in sexual activities for which a person could be charged with a criminal offense.

This is a violation of Title 18, United States Code, Section 2422(b).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

(Extortion by Interstate Communication)

On or about April 25, 2006, and continuing to on or about April 30, 2006, in Scott County in the Southern District of Iowa, and elsewhere, the defendant, JASON EDWARD STELLA, with the intent to extort from a person any thing of value, did transmit in interstate commerce a communication containing a threat to injure the reputation of another.

This is a violation of Title 18, United States Code, Section 875(d).

THE GRAND JURY FURTHER CHARGES:

**COUNT 3
(Sexual Exploitation of a Minor)**

On or about February 5, 2006 to February 6, 2006, in Scott County in the Southern District of Iowa, and elsewhere, the defendant, JASON EDWARD STELLA did knowingly attempt to use, persuade, induce, and entice a minor to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, specifically by recording video and webcam images and saving images onto a computer compact disc, such visual depiction being produced using materials that have been mailed, shipped, or transported in interstate commerce.

This is a violation of Title 18, United States Code, Sections 2251(a) and (e).

THE GRAND JURY FURTHER FINDS:

**COUNT 4
(Forfeiture)**

1. The allegations contained in Counts 1 and 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 18, United States Code, Section 2253.

2. From his engagement in any or all of the violations alleged in Counts 1 and 3 of this Indictment, the defendant, JASON EDWARD STELLA, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all interest in:

- a. Any visual depiction or other matter containing such
visual depiction which was produced, transported,

mailed, shipped, received, or possessed as alleged in
Counts 1 and 3 of this Indictment;

- b. Any property, real or personal, constituting or
traceable to gross profits or other proceeds obtained
from the offense alleged in Counts 1 and 3 of this
Indictment; and
- c. Any property, real or personal, used or intended to
be used to commit or to promote the commission of
the offense alleged in Counts 1 and 3 of this
Indictment.

3. The property referenced in paragraphs 2, subparagraphs a, b, and c above includes, but is not limited to, computer hardware such as monitors, central processing units, and keyboards, computer programs, software, computer storage devices such as disk drive units, disks, tapes, and hard disk drives/units, peripherals, modems and other telephonic and acoustical equipment, printers, contents of memory data contained in and through the aforementioned hardware and software, tools, equipment, manuals and documentation for the assembly and use of the aforementioned hardware and software.

4. If, as a result of any act or omission of the defendant, JASON EDWARD STELLA, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(o), to seek forfeiture of any other property of the defendant, JASON EDWARD STELLA, up to the value of any forfeitable property described above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL

Matthew G. Whitaker
United States Attorney

/s/
FOREPERSON

By: /s/ Richard D. Westphal
Richard D. Westphal
Assistant United States Attorney